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COVER NOTE

From:	Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director
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To:	Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union

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Subject:	RSB Opinion REGULATORY SCRUTINY BOARD OPINION Impact assessment on EU funding for cross-border education and training, solidarity, youth, media, culture and creative sectors, values, and civil society.

Delegations will find attached document SEC(2025) 547 final.

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REGULATORY SCRUTINY BOARD OPINION

Impact assessment on EU funding for cross-border education and training, solidarity, youth, media, culture and creative sectors, values, and civil society.

{COM(2025) 550; COM(2025) 549}

{SWD(2025) 550-551}



Brussels,
RSB

Opinion

Title: Impact assessment on EU funding for cross-border education and training, solidarity, youth, media, culture and creative sectors, values, and civil society.

(A) Policy context

The report concerns EU funding post 2027 for cross-border education and training, solidarity, youth, media, culture and creative sectors, values, and civil society. It considers a new programme structure under the Multiannual Financial Framework (MFF) which will replace several existing funding instruments; Citizens, Equality, Rights and Values (CERV), Justice programme, Creative Europe, Multimedia Actions line, Erasmus+, European Solidarity Corps, as well as clusters from other EU funding programmes linked to the policy areas covered by this impact assessment.

Under the Commission's Political Guidelines, the next MFF sets out to be more focused, simpler and more impactful. Better Regulation Tool #9 acknowledges that 'the special case of preparing a new multiannual financial framework is a unique process requiring a specific approach as regards scope and depth of analysis'. The architecture of the new MFF will be significantly different from the current structure. Given that at this stage the impact assessment lacks several key elements the Board has decided, exceptionally, to issue an Opinion without qualification.

(B) Key issues and recommendations

The Board notes the additional information provided and commitments to make changes to the report.

However, the report still contains significant shortcomings. The Board makes the following recommendations for the lead Services to rectify:

This opinion concerns a draft impact assessment which may differ from the final version.

On scope: The report does not explain why other EU funding instruments addressing the same policy priorities and objectives as this MFF cluster, do not fall within the scope of this initiative.

Given that the proposal is centred on EU values, the report should better explain the reasons for excluding relevant segments from other EU funding programmes (such as the Digital Europe Programme, Horizon Europe, ESF+, ERDF etc), from the scope of this initiative. It should explain the relationship between this initiative and the future European and Social Fund (ESF).

The scope of the report primarily covers the financial architecture rather than the policy substance, i.e. such as the objectives intended to be achieved, as well as the types of activities that will receive funding. The report needs to demonstrate that the financial architecture is well suited to facilitate delivery on the policy objectives, since desired synergies and results are unlikely to materialise without the alignment between the policy objectives and financial architecture. The report should also analyse if parts of current programmes should be discontinued or re-oriented.

On the problem definition and on the use of evaluations: The report should clearly state the degrees of uncertainty in the conclusions from prior evaluations of individual programmes and how strongly the conclusions are supported by a reliable evidence base, taking also into account opinions from the RSB.

It should clarify whether the identified policy problems are new or recurrent. The problem definition should distinguish more rigorously between problems and problem drivers, it should also be clear which identified problems constitute societal problems, market or regulatory failures that justify a public intervention, and which problems are perceived shortcomings of already existing public interventions. It should better explain to what extent, and which of the problems have been successfully addressed by existing EU funding also considering that some of the programmes have been running for a long time. It should describe the magnitude of the remaining problems moving forward and better clarify what market failures and other gaps remain unaddressed. The report acknowledges that priorities under this cluster are currently addressed from different perspectives by several EU instruments also beyond this cluster. It should further explain how synergies between them under the new funding structure will be ensured.

On the intervention logic and objectives: The report does not explain the magnitude of the gaps and market failures to be addressed. The proposed objectives are not S.M.A.R.T.

Analysis of magnitude of the identified problems should inform prioritisation and the focus of the intervention. The report should describe the objectives in S.M.A.R.T. terms to define the success and to facilitate monitoring and evaluation. The specific objectives related to general objective 1 include concrete areas of intervention without sufficient substantiation and causal links. The report should better clarify how the proposed options address general objectives 1 and 2. The report should explore in more detail concrete synergies across the objectives, e.g. in the area of disinformation.

On comparison of options and cost-benefit analysis: The report does not adequately assess the costs and benefits of the options.

Options beyond those on financial architecture should be included as trade-offs between flexibility and predictability on the one hand, and complexity and simplicity of the funding landscape on the other hand, are not sufficient to identify options and assess their impacts. The report should assess the aspects which are central for reaching the general and specific objectives of the initiative and put forward a corresponding range of options. In defining the options the report should describe what kind of activities are to be funded and if different existing programmes are intended to be re-oriented or discontinued.

The report should fully utilise the evaluation findings of individual programmes and evidence from stakeholder consultations to substantiate the discussion on impacts. It should explain to what extent the significance of the expected impacts is sensitive to the amount of the financial envelope to be allocated for this cluster. It should differentiate between direct and indirect economic impacts more clearly and explain the expected contribution of this initiative to any quantitative projections presented in the report. In terms of costs and benefits, Option 2 is claimed to be superior to delivering the identified simplification and burden reduction benefits compared to Option 3. However, the report should provide additional analysis of administrative costs and to indicate to the extent possible what the respective quantitative benefits are.

On governance: The report does not sufficiently describe the governance mechanisms.

The report should better explain the governance aspect in each of the proposed options to better justify the options' ranking. It should further clarify the functioning of the preferred option, principles of its governance, including how funding and allocation decisions will be taken, by whom, and how the specificity of different policy areas will be addressed. It should identify principles for identifying priority areas for funding.

On coherence: The report does not sufficiently specify how the proposed initiative links with other parts of the post-2027 MFF, such as National Envelopes and Competitiveness Fund.

It should explain how potential overlaps and redundancies between those programmes will be identified and dealt with. Taking into account the predominance of the Member State competences in these areas, the report should more thoroughly analyse how measures of this programme will relate to Member State interventions in the fields of education and training, solidarity, youth, media, culture, creative sectors, values and civil society.

On future monitoring and evaluation: The report is not clear what monitoring and evaluation arrangements will be put in place to measure the achievement of the initiative's objectives and how the Performance and Monitoring framework would be implemented in this case.

After defining the objectives in S.M.A.R.T. terms the report should outline appropriate monitoring and evaluation arrangements which would allow to monitor the progress on achieving the objectives. The report should include a data plan which would ensure that different types of data building on appropriate methods and modern tools for data collection, retrieval and analysis are available for the evaluation without increasing administrative burden.

The report should clear how specific indicators relevant to the objectives of the instrument will be identified and used in the performance monitoring.

Some more technical comments have been sent directly to the lead Service(s).

(C) Conclusion

The lead Services should revise the report in accordance with the Board's recommendations before launching the interservice consultation.

Full title	Post MFF 2027 - impact assessment on EU funding for cross-border education and training, solidarity, youth, media, culture and creative sectors, values, and civil society.
Reference number	2025/MFF/04
Submitted to RSB on	22 May 2025
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